

UNITED STATES OF AMERICA  
EASTERN DISTRICT OF MICHIGAN

NATIONWIDE RECOVERY, INC.,

Plaintiff,

Case No. 4:17-cv-12378

Hon. Linda V. Parker

vs.

CITY OF DETROIT,

Defendant.

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NATIONWIDE RECOVERY'S BRIEF IN RESPONSE TO THE CITY OF  
DETROIT'S MOTION FOR LEAVE TO FILE BRIEF (ECF No. 191)

The City of Detroit's proposed Supplemental Brief fails to provide any legal justification to depose third party governmental employees.

The City used state law Freedom of Information Act requests to discover that there is no evidence to support its conspiracy theories. The municipalities produced nothing to support the City's defense. According to the City, this complete lack of evidence is evidence in itself. This is absurd.

Nationwide's damages are the remaining issue before the Court. Its governmental accounts have no relevance to the issue at hand.

The City has not offered any legitimate factual or legal reason to depose third party government employees. As such, the Court should deny the City's Motion and preclude the City from deposing third party government employees.

Respectfully submitted:

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*Attorneys for Nationwide Recovery*

September 2, 2021

#### CERTIFICATE OF SERVICE

On September 2, 2021, the undersigned caused the foregoing document to be served on all parties that have appeared in this action by filing the same with the Court using the ECF System.

/s/ Marc A. Deldin